

Appendix C – Documents Cited in Kreindler and Pounian Affidavit

Source¹	Exhibit	Paragraph	Previous Use	Cited in Other Affidavits, Declarations, or Filings	Reasons Inadmissible and/or Immaterial²
Declaration of Stephen K Moore	Exhibit 1	6-7, 9, 29			Hearsay, FRE 602, Preliminary investigative material
FBI Report Oct 5, 2012 [“Florida Bulldog Memorandum”]	Exhibit 2	8-9		Consol. Am. Compl. Appx. 3 (ECF No. 3463-4); Tarbutton Ex. 10	Hearsay, FRE 602, FRE 901, Preliminary investigative material
911 Commission Interviews of Thumairy Feb 23-24, 2004	Exhibit 3	9, 18, 53	Aver. Ex. 31 (ECF No. 2930)	Tarbutton Ex. 24	Hearsay, FRE 602, Preliminary investigative material
911 Commission Interview of Khalil al Khalil Feb 24, 2004	Exhibit 4	9		Tarbutton Ex. 28	Hearsay, FRE 602, Preliminary investigative material
FBI Report Sep 4, 2002	Exhibit 5	9	Aver. Ex. 35 (ECF No. 2930)	Tarbutton Ex. 35	Hearsay, FRE 602, FRE 901, Preliminary investigative material
911 Commission Interview of Bayoumi Oct 16-17, 2003	Exhibit 6	9, 16, 216	Aver. Ex. 30 (ECF No. 2930)	Tarbutton Ex. 23	Hearsay, FRE 602, Preliminary investigative material

¹ Document descriptions, other than bracketed text indicating commonly-used short-form descriptors, are taken directly from the “Index of Exhibits” attached to the Affidavit or from the Affidavit itself. Their use is for convenience only and should not be taken as a concession that the descriptions are accurate.

² Defendant’s objections to the cited documents are made for purposes of the pending motion to dismiss. Defendant reserves the right to move to exclude, or to assert additional objections, in the event that any party seeks to admit any of the cited documents into evidence in any future proceeding.

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Source	Exhibit	Paragraph	Previous Use	Cited in Other Affidavits, Declarations, or Filings	Reasons Inadmissible and/or Immaterial
FTO of al Qaeda Federal Register Volume 64 Issue 195 Friday, October 8, 1999	Exhibit 7	7			
911 Commission Team 1A Omar Al Bayoumi Rental Agreement	Exhibit 8	9			Hearsay
FBI Report Sep 17, 2003	Exhibit 9	9		Tarbutton Ex. 65	Hearsay, FRE 602, FRE 901, Preliminary investigative material
911 Commission Interview FBI Special Agent #1 Nov 17, 2003	Exhibit 10	9			Hearsay, FRE 602, Preliminary investigative material
FBI Report April 2002	Exhibit 11	9	Aver. Ex. 63 (ECF No. 2930)	Tarbutton Ex. 46	Hearsay, FRE 602, FRE 901, Preliminary investigative material
911 Commission Interview FBI Special Agent #2 Nov 17, 2003	Exhibit 12	9, 24	Aver. Ex. 33 (ECF No. 2930)	Tarbutton Ex. 26	Hearsay, FRE 602, Preliminary investigative material
Congressional Joint Inquiry Report Excerpt – The 28 Pages [“Part Four”]	Exhibit 13	9, 14, 21, 23-24, 26, 29, 50, 52, 54, 72, 176, 178, 205		Consol. Am. Compl., Appx. 2 (ECF Nos. 3463-2-3); Tarbutton Ex. 12	Hearsay, FRE 602, Preliminary investigative material
Bayoumi’s Work History and Status	Exhibit 14	10-13, 15			Hearsay
FBI Inspector General Review excerpt	Exhibit 15	15			Hearsay, FRE 602, Preliminary investigative material

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911 Commission Tele Link Bayoumi and Aulaqi	Exhibit 16	16			Hearsay, FRE 602, Preliminary investigative material
Treasury Designates Anwar Al-Aulaqi	Exhibit 17	17			Hearsay, FRE 602
Remarks by the President September 30, 2011	Exhibit 18	17			
FBI Report Oct 25, 2002	Exhibit 19	18		Tarbutton Ex. 36	Hearsay, FRE 602, FRE 901, Preliminary investigative material
WAMY Letter from KSA Embassy Nov 15 2001	Exhibit 20	19			Hearsay, FRE 901
Letter to WAMY from Al Sowailem May 6 2001	Exhibit 21	19, 181			Hearsay, FRE 901
911 Commission Interview of Shalawi Oct 22, 2003	Exhibit 22	19, 49, 51-53		Tarbutton Ex. 30	Hearsay, FRE 602, Preliminary investigative material
Letter to WAMY from Al Sowailem Oct 19 1995	Exhibit 23	20			Hearsay, FRE 901
State Department Diplomatic List Summer 2003	Exhibit 24	20			
FBI Vault Investigation September 2002 excerpts	Exhibit 25	21			Hearsay, FRE 901, Preliminary investigative material
State Department Diplomatic List Winter 2004	Exhibit 26	22			
Washington Post U.S. Revokes Visas of 16 at Islamic Institute Jan 29, 2004	Exhibit 27	22			Hearsay, FRE 602

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State Department Press Briefing Saudi Arabia Diplomatic Visas (taken questions) Jan 28, 2004	Exhibit 28	22			Hearsay, FRE 602
US v Mohamed Docket #88 Defendant's Motions in Limine	Exhibit 29	22, 35			Hearsay, FRE 602
Treasury Department Releases List of 39 Additional SDGTs Oct 12, 2001	Exhibit 30	23			
Kadi Production Excerpts re Transfer to KSA Embassy	Exhibit 31	23			Hearsay, FRE 602, FRE 901
Statement Under Oath of Zacarias Moussaoui Oct 20 2004	Exhibit 32	25, 60-61, 72	Affirm. of Sean P. Carter, Ex. 5 (ECF No. 2927-5)		Hearsay, FRE 602
Curacao Commercial Register ASPCOL NV	Exhibit 33	26			Hearsay, FRE 901
Declaration of James Crum	Exhibit 34	27			Hearsay, FRE 602
King Fahad Mosque Home Page	Exhibit 35	29			Hearsay, FRE 602
Treasury Department and United Nations Press Releases	Exhibit 36	29			
US v Bin Laden Indictment Transcript and Exhibit Excerpts	Exhibit 37	29			Hearsay, FRE 901
United Nations Security Council Letter Dated September 14 2004	Exhibit 38	29			Hearsay
Madrid Central Trial Court Indictment excerpts	Exhibit 39	29, 55-56, 94			Hearsay, FRE 901
911 Commission Interview FBI SA Rivers	Exhibit 40	29			Hearsay, FRE 602, Preliminary investigative material

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US v Mohamed Docket #39 Superseding indictment	Exhibit 41	30, 34, 37			Hearsay, FRE 602, Preliminary investigative material
California Secretary of State Business Entity WSRA	Exhibit 42	30			
Western Somali Relief Agency IRS Form 990 1999 partial	Exhibit 43	30			FRE 901
US v Mohamed Docket #35 Government's Response and Statement of Facts	Exhibit 44	30, 34			Hearsay, FRE 602, Preliminary investigative material
US v Mohamed 161 Memo of Points and Authorities with Exhibits	Exhibit 45	30, 36, 84			Hearsay, FRE 602
Treasury Department Designations GRF and AHIF	Exhibit 46	31			
The Kingdom of Saudi Arabia and Counter Terrorism May 2016 Excerpts	Exhibit 47	31, 70, 86			
Department of Defense JTF-GTMO Detainee Assessment SO 567	Exhibit 48	32			Hearsay, FRE 602, FRE 901, Preliminary investigative material
US v Mohamed Docket #137 Govt Trial Memorandum and #129	Exhibit 49	34, 37			Hearsay, FRE 602
US v Mohamed Docket #153 Verdict Excerpts	Exhibit 50	35			Hearsay, FRE 602, FRE 901
US v Mohamed Docket #25 Travel Excerpts	Exhibit 51	36			Hearsay, FRE 602
US v Mohamed Docket #188 Judgment	Exhibit 52	37			

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911 and Terrorist Travel Excerpts	Exhibit 53	40-41, 43, 45			
Statement Under Oath of Zacarias Moussaoui October 21, 2014	Exhibit 54	44	Affirm. of Sean P. Carter, Ex. 7 (ECF No. 2927-7)		Hearsay, FRE 602
AP Saudis US disclose operations on terrorism October 17, 2003	Exhibit 55	46			Hearsay, FRE 602
CNN Ex-Saudi ambassador Kingdom could have helped U.S. prevent 911 November 2, 2017	Exhibit 56	47			Hearsay, FRE 602
Saudi Embassy News Archives IIASA Announces Plan June 23, 1999	Exhibit 57	49			Hearsay
IIASA - One Hundred Years of the Kingdom of Saudi Arabia	Exhibit 58	49, 185			
Al-Qudhaieen v America West Airlines Inc	Exhibit 59	49-50			Hearsay
911 Commission Interview FBI SA January 7 2004	Exhibit 60	51			Hearsay, FRE 602, Preliminary investigative material
US v Arnaout Second Superseding Indictment	Exhibit 61	51, 170			Hearsay, FRE 602
911 Commission Updated Work Plan June 6, 2003	Exhibit 62	51-52		Consol. Am. Compl., Appx. 4 (ECF No. 3463-5)	Hearsay, FRE 602, Preliminary investigative material
911 Commission Interview Qudhaieen October 25-26, 2003	Exhibit 63	52-53			Hearsay, FRE 602, Preliminary investigative material

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911 Commission Interview FBI SA Kuhn	Exhibit 64	52			Hearsay, FRE 602, Preliminary investigative material
Constitution and Bylaws of the Saudi Student Club	Exhibit 65	52			Hearsay, FRE 901
Combating Terrorism Center, U.S. Military Academy Militant Ideology Atlas Excerpt	Exhibit 66	53			Hearsay
CIA 11 September The Plot and the Plotters	Exhibit 67	53-54, 109, 202			Hearsay, FRE 602, Preliminary investigative material
Saudi Information Agency Profiles of 911 Saudi Hijackers Revealed	Exhibit 68	53			Hearsay, FRE 901
911 Commission Interview FBI SA Jan 5, 2004	Exhibit 69	54			Hearsay, FRE 602, Preliminary investigative material
U.S. v Ghailani Declaration of Nicholas Lewin excerpts	Exhibit 70	54			Hearsay, FRE 602
Report of the Congressional Joint Inquiry excerpts [“Joint Inquiry”]	Exhibit 71	24, 55-56	Averment		Hearsay, FRE 602, Preliminary investigative material
Chicago Tribune - 2 Firms linked to al Qaeda Saudi intelligence March 31, 2004	Exhibit 72	56			Hearsay, FRE 602
Royal Embassy of Saudi Arabia Basic Law of Governance	Exhibit 73	57	Affirm. of Sean P. Carter, Ex. 10 (ECF No. 2927-10)		

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Royal Embassy of Saudi Arabia King Fahd's Speech on the issuance of the Basic Law of Governance	Exhibit 74	57	Affirm. of Sean P. Carter, Ex. 11 (ECF No. 2927-11)		
03-MDL-1570 - Sean Carter Affirmation Exhibit 14 - A Blessed Occasion Lecture of Deputy Minister	Exhibit 75	58	Affirm. of Sean P. Carter, Ex. 14 (ECF No. 2927-14)		Hearsay, FRE 602, FRE 901
Oxford Dictionary of Islam excerpt	Exhibit 76	59			
03-MDL-1570 - Memorandum Decision and Report and Recommendation October 28, 2013 excerpts	Exhibit 77	63	ECF No. 2789		
03-MDL-1570 - Judgment April 25, 2014	Exhibit 78	63	ECF No. 2853		
03-MDL-1570 - Memorandum Opinion and Order August 2, 2016	Exhibit 79	63	ECF No. 3323		
Affidavit of Farooq	Exhibit 80	64-65			Hearsay, FRE 602, FRE 901
Wael Jelaidan Resume	Exhibit 81	65, 98, 118, 197	Aver. Ex. 15 (ECF No. 2930)		Hearsay, FRE 901
Observatoire Action Humanitaire Aid Watch	Exhibit 82	66			Hearsay, FRE 602
Combating Terrorism Center, U.S. Military Academy Abdullah Muhammad Fazul	Exhibit 83	67			Hearsay, FRE 602
Wikipedia Arabic Saleh bin Abdulaziz Al Alsheikh	Exhibit 84	68			Hearsay, FRE 602
Al Haramain About Us 2001 2-3	Exhibit 85	69			Hearsay, FRE 602, FRE 901
Al Haramain About Us 2003	Exhibit 86	69			Hearsay, FRE 602, FRE 901

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03-MDL-1570 - Affidavit of Khalid Bin Obaid Azzhari	Exhibit 87	70	ECF No. 104-2; Aver. Ex. 195 (ECF No. 2930)		Hearsay, FRE 602
AH00596-599 AHIF Bangladesh Annual Report 2001	Exhibit 88	71			Hearsay, FRE 602, FRE 901
Royal Embassy of Saudi Arabia - Saudi Arabia and the United States Take Joint Action	Exhibit 89	73			
CRS Report for Congress Saudi Arabia Terrorist Financing Issues	Exhibit 90	73			Hearsay, FRE 602
Treasury Department Additional al Haramain Branches and Former Leader Designations	Exhibit 91	74	Aver. Ex. 204 (ECF No. 2930)		Hearsay, FRE 602
Treasury Designates U.S Branch and Director	Exhibit 92	75	Aver. Ex. 206 (ECF No. 2930)		Hearsay, FRE 602, Preliminary investigative material
Petition for Delisting Soliman H. al-Buthi	Exhibit 93	75-76			Hearsay, FRE 901
Prince Dr. Abdulaziz bin Mohammed bin Ayyaf	Exhibit 94	75			Hearsay
Riyadh Princes	Exhibit 95	75			Hearsay
Soliman Hamed Al-Buthi Business Cards	Exhibit 96	76			FRE 901
Delisting Request	Exhibit 97	77			Hearsay, FRE 602
US v Al Haramain Statement of Facts	Exhibit 98	78, 85			Hearsay, FRE 602
Letter Bernabei to Newcomb May 14, 2004	Exhibit 99	79			Hearsay, FRE 602
U.S. v Sedaghaty Declaration of Christopher L Cardani February 1, 2010	Exhibit 100	80			Hearsay

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U.S. v Sedaghaty Declaration of Christopher L Cardani Exh. B al Rajhi Subpoena	Exhibit 101	80			
U.S. v Sedaghaty Declaration of al-Kholaifi February 8, 2010	Exhibit 102	80			Hearsay
Saudi Embassy News Archives September 20, 1999 and Ain al Yaqueen May 26, 2000	Exhibit 103	81			Hearsay, FRE 901
Shoumar email	Exhibit 104	82			Hearsay, FRE 901
State Department Cable 06Riyadh8314	Exhibit 105	83	Aver. Ex. 207 (ECF No. 2930)		Hearsay, FRE 602, FRE 901
AHIF and WSRA Email Communications 2000	Exhibit 106	84			Hearsay, FRE 901
AHIF Monthly Summary Report and checks	Exhibit 107	85			Hearsay, FRE 901
State Department Cable Islamabad September 28, 1998	Exhibit 108	87			Hearsay, FRE 602, FRE 901
State Department Cable Islamabad December 21, 1998	Exhibit 109	87			Hearsay, FRE 602, FRE 901
Islamic Emirate of Afghanistan Communications	Exhibit 110	87			Hearsay, FRE 901
CNN - Saudis break diplomatic ties with Taliban - September 25, 2001	Exhibit 111	87			Hearsay, FRE 602
Department of Defense Memorandum JTF-GTMO Detainee Assessment YM 027	Exhibit 112	88			Hearsay, FRE 602, FRE 901, Preliminary investigative material
Bundeskriminalamat Meckenheim - al Haramain	Exhibit 113	89, 94			Hearsay, FRE 602, FRE 901, Preliminary investigative material

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Intelligence Online #418 2001 11-29 Saudi Regime Again Betrayed by its Own	Exhibit 114	89			Hearsay
Department of Defense Memorandum JTF-GTMO Detainee Assessment KU 551dp	Exhibit 115	90			Hearsay, FRE 602, FRE 901, Preliminary investigative material
Department of Defense Memorandum JTF-GTMO Detainee Assessment KU 552	Exhibit 116	91			Hearsay, FRE 602, FRE 901, Preliminary investigative material
Dept of Defense JFT-GTMO Detainee Assessment US9YM-000242DP(S)	Exhibit 117	92			Hearsay, FRE 602, FRE 901, Preliminary investigative material
Department of Defense Memorandum JTF-GTMO Detainee Assessment YM 441	Exhibit 118	93			Hearsay, FRE 602, FRE 901, Preliminary investigative material
AHIF Belgium and Europe Committee	Exhibit 119	94			Hearsay, FRE 901
Ain Aa Yaqueen April 20, 2001	Exhibit 120	94			Hearsay, FRE 602
State Department - Patterns of Global Terrorism 2004 Country Reports - excerpts	Exhibit 121	94			Hearsay
United Nations Security Council Committee - Reasons for Listing - Tarek Al Maaroufi	Exhibit 122	94			Hearsay
CIA 1996 Report on Balkans Charities	Exhibit 123	98	Aver. Ex. 95 (ECF No. 2930)		Hearsay, FRE 602, FRE 901, Preliminary investigative material
Arab News - US urged to give sound proof in Julaidan's case -August 9, 2002	Exhibit 124	98			Hearsay, FRE 602

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Donations by Saudi Princes to Al Qaeda charities	Exhibit 125	99, 139			Hearsay, FRE 602, FRE 901, Preliminary investigative material
Prince Sultan Motion to Dismiss Excerpts	Exhibit 126	99			Hearsay
The Muslim World Interview of al Obaid July 1997	Exhibit 127	100, 102	Aver. Ex. 132 (ECF No. 2930)		Hearsay
IIRO Pakistan Verification of Receipts and Payments	Exhibit 128	101-102			Hearsay, FRE 901
IIRO Letter of August 3, 1994	Exhibit 129	102			Hearsay, FRE 901
Saudi Press Agency - News agency reports details of Saudi relief aid to Afghanistan - May 19, 2001	Exhibit 130	103-104			Hearsay, FRE 602
01-1535 Cr Supplemental Appendix 1035-1037 Jamal al Fadl Videoconference Excerpts	Exhibit 131	102, 105			Hearsay, FRE 602
Saudi Gazette October 3, 1995	Exhibit 132	106			Hearsay, FRE 602
FBI Letterhead Memorandum April 26, 2005 Excerpts	Exhibit 133	107			Hearsay, FRE 602, FRE 901, Preliminary investigative material
United Nations Security Council Letter Dated December 1, 2003 Excerpts	Exhibit 134	108			Hearsay, FRE 602, Preliminary investigative material
State Department Cable Washington DC April 20, 2004	Exhibit 135	109	Aver. Ex. 117 (ECF No. 2930)		Hearsay, FRE 602, FRE 901
Testimony of Mathew Epstein with Evan Kohlmann March 11, 2003	Exhibit 136	110			Hearsay, FRE 602

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Department of Defense Memorandum JTF-GTMO Detainee Assessment SA 516	Exhibit 137	111			Hearsay, FRE 602, FRE 901, Preliminary investigative material
Department of Defense JTF-GTMO Detainee Assessment YM 033	Exhibit 138	112			Hearsay, FRE 602, FRE 901, Preliminary investigative material
State Department Cable 07Khartoum214	Exhibit 139	113	Aver. Ex. 156 (ECF No. 2930)		Hearsay, FRE 602, FRE 901
Arab News - More Aid For Afghans Sought - May 4, 1987	Exhibit 140	114			Hearsay, FRE 602
Yale University Library - Guide to the Islamic Fundamentalist Audio Recordings Collection excerpt	Exhibit 141	115			Hearsay, FRE 901
Guardian - Militant Islam's Saudi Paymasters - Feb 29, 1992	Exhibit 142	116			Hearsay, FRE 602
Naseef 015-017	Exhibit 143	117, 185			Hearsay, FRE 901
MWL IIRO Memorandum from Tareeq Osama	Exhibit 144	118			Hearsay, FRE 901
US v. Arnaout - Governments Evidentiary Proffer Supporting Admissibility of Coconspirator Evidence	Exhibit 145	118-119, 172, 174	Aver. Ex. 138 (ECF No. 2930)		Hearsay, FRE 602, Preliminary investigative material
Royal Embassy of Saudi Arabia London - Saudi Arabia Under Attack	Exhibit 146	119			Hearsay, FRE 602, FRE 901
Letter of October 22, 1995 re Grand Mufti nomination	Exhibit 147	120		Haefele Ex. 37T	
Letter of November 2, 2000 re Turki appointment	Exhibit 148	121		Haefele Ex. 81T	Hearsay

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IIRO Constitution	Exhibit 149	121			FRE 901
Saudi Embassy News Archives MWL Reports Billion Dollar Saudi Support	Exhibit 150	122			Hearsay, FRE 602
King's letter re directions to charities	Exhibit 151	123			FRE 901
Royal Decree re Bangladesh	Exhibit 152	124			FRE 901
03-MDL-1570 - Declaration of Abdullah Bin Saleh Al-Obaid	Exhibit 153	125	ECF No. 98-2; Aver. Ex. 120 (ECF No. 2930)		Hearsay
MWL Letter to King re Poland	Exhibit 154	126			Hearsay, FRE 901
Declaration Abdulaziz H. al Fahad	Exhibit 155	127, 183	ECF No. 85-3; Aver. Ex. 119 (ECF No. 2930)		Hearsay, FRE 602
KSA Letter to MWL Embassy DC Criteria	Exhibit 156	128			FRE 901
KSA letter from Beijing religious attache to IIRO, 5-14-99	Exhibit 157	129			FRE 901
KSA letter to MWL re Philippines Institute 9-6-99	Exhibit 158	130			FRE 901
MWL form re funding for Mosque in Philippines, 1993	Exhibit 159	131			FRE 901
Form letter re applications for financial assistance	Exhibit 160	132			FRE 901
MWL letter to Ministry of Islamic Affairs re Bulgaria	Exhibit 161	133			FRE 901
IIRO letter to Minister of Foreign Affairs re forming committee, 11-28-99	Exhibit 162	134			Hearsay, FRE 901

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IIRO spreadsheet showing KSA relief to Sierra Leone	Exhibit 163	135			Hearsay, FRE 901
03-MDL-1570 - Affirmation of Sean P. Carter Exhibit 13 Lecture of Sheikh Saleh	Exhibit 164	136	Affirm. of Sean P. Carter, Ex. 13 (ECF No. 2927-13)		
02-cv-01616 DCDC - Declaration Ali Ahmed Al-Kamal	Exhibit 165	137	Aver. Ex. 118 (ECF No. 2930)		Hearsay
MWL statement of revenues and expenditures	Exhibit 166	138			Hearsay, FRE 901
02-cv-01616 DCDC - Declaration of Saleh Abdullah al Saykhan	Exhibit 167	139	Aver. Ex. 135 (ECF No. 2930)		Hearsay
Government Profile Majlis al Shura	Exhibit 168	140			
Saudi Economic Survey October 13, 1999	Exhibit 169	141			Hearsay, FRE 602
Kingdom of Saudi Arabia Portal His Eminence Shaykh Bin Baz	Exhibit 170	142			Hearsay
IIRO letter re KSA as IIRO in Thailand, 5-7-99	Exhibit 171	143			Hearsay
MWL seeks loan of government employee	Exhibit 172	144			FRE 901
Letter re KSA as IIRO in Ethiopia, 9-18-01	Exhibit 173	145		Haefele Ex. 25T	Hearsay
Memo regarding MWL in London	Exhibit 174	146			Hearsay, FRE 901
Pakistani hotel receipts	Exhibit 175	147			FRE 901
MWL letter re diplomatic passports, 4-24-01	Exhibit 176	148			FRE 901
Letter Kabat to Carter June 2, 2107	Exhibit 177	149			Hearsay, FRE 602
1993-2002 correspondence re Philippine full diplomatic immunity same as Malaysia and Indonesia	Exhibit 178	150			Hearsay, FRE 901

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Summary of Development Activities by Khalifa	Exhibit 179	151			Hearsay, FRE 901
Deed of sale sent to MWL care of KSA in Philippines, 1989	Exhibit 180	152			FRE 901
London Sunday Business-Saudi charity comes under fresh scrutiny, 12-22-96	Exhibit 181	152			Hearsay, FRE 602
Canada v Jaballah excerpts	Exhibit 182	153	Aver. Ex. 122 (ECF No. 2930)		Hearsay, Preliminary investigative material
Directions to transfer MWL funds to KSA Moscow Embassy	Exhibit 183	154			FRE 901
MWL transfer of Funds to KSA Embassy in Indonesia, 4-00	Exhibit 184	154			FRE 901
MWL check to KSA Embassy Zambia, 12-97	Exhibit 185	154			FRE 901
US v Noshan Superseding Indictment and MWLIRO 00065788 KSA payroll Noshan	Exhibit 186	154			Hearsay, FRE 602
MWL-IIRO letter seeking KSA Germany to receive check for IIRO	Exhibit 187	154			FRE 901
MWL-IIRO letter to KSA Russia showing IIRO deposit into Embassy Acct, 5-00	Exhibit 188	155			FRE 901
Fax showing transfer of funds to KSA Niger paying salaries, 9-21-99	Exhibit 189	155			FRE 901
MWL letter to KSA Embassy India	Exhibit 190	155			FRE 901
Letter from KSA Asmara Embassy to IIRO re aid to Eritrea	Exhibit 191	155			
Letter from KSA Manila Embassy to IIRO re Rice Purchases	Exhibit 192	155			

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IIRO letter to KSA seeking approval of delivery, 9-19-98	Exhibit 193	155			FRE 901
Letter from KSA Dhaka to IIRO Bangladesh re IIRO aid to military, 2-28-99	Exhibit 194	155			
Letter from KSA to IIRO re KSA distribution dates to religious entities, 3-2-99	Exhibit 195	155			
MWL-IIRO packing list for KSA Embassy	Exhibit 196	155			Hearsay, FRE 901
KSA Embassy Fax to IIRO re Morocco Association for Children Forms, 10-9-00	Exhibit 197	155			
Riyadh Daily - IIRO delivers aid to Lebanon - April 27, 1996	Exhibit 198	155			Hearsay, FRE 602
Ain al Yaqueen - May 18, 2001 re Bulgaria	Exhibit 199	155			Hearsay, FRE 602
IIRO Financial Regulations excerpts	Exhibit 200	156			Hearsay, FRE 901
MWL-IIRO letter to KSA requesting diplomatic plates in India, 7-18-00	Exhibit 201	157		Haefele Ex. 24T	Hearsay
Letter to IIRO from KSA Embassy Jakarta re Indonesia projects, 5-28-01	Exhibit 202	158			
KSA to MWL re Royal Order on Muslim Minority, 7-27-99	Exhibit 203	159			
MWL-IIRO letter to IIRO Eastern Province re Royal Approval for Kosovo donations, 4-21-99	Exhibit 204	160			FRE 901
MWL-IIRO fax to Moscow Embassy re Russian seizure of IIRO properties, 7-11-00	Exhibit 205	161			FRE 901
MWL-IIRO letter to Ministry of Islamic Affairs re coordinating, 8-31-01	Exhibit 206	162			Hearsay, FRE 901

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IIRO HQ letter to all IIRO offices to coordinate Ramadan with local KSA embassy, 2-10	Exhibit 207	163		Haefele Ex. 85T	Hearsay
MWL letter to KSA re MWL care for KSA Switzerland property, 6-24-01	Exhibit 208	164			Hearsay, FRE 901
MWL letter to KSA USA embassy to fund Ethiopian Muslim Assn in Washington, 6-8-99	Exhibit 209	165			FRE 901
KSA Manila letter to IIRO requesting money for support of Muslims affected by conflict, 5-31-00	Exhibit 210	166			
KSA Islamabad letter to IIRO re KSA embassy steering work of IIRO in Afghanistan, 5-23-01	Exhibit 211	167			
MWL-IIRO Islamabad letter to Sec-Gen that KSA embassy ordered IIRO not to speak to media, 10-31-01	Exhibit 212	168			Hearsay, FRE 901
WAMY Bulletin, letter, notes, Treasury Designation of Batterjee	Exhibit 213	169, 171			Hearsay, FRE 901
State Department Cable Washington DC November 9, 2002	Exhibit 214	173			Hearsay, FRE 602, FRE 901
WAMY USA profit and loss statement and Canada part of WAMY Int'l	Exhibit 215	174			Hearsay, FRE 901
Bank of Montreal Bank Statement WAMY operating as BIF, 4-5-01	Exhibit 216	174			Hearsay, FRE 901
Canada Revenue Agency Notice of Revocation Jan 2012	Exhibit 217	174	Aver. Ex. 191 (ECF No. 2930)		Hearsay, FRE 602, FRE 901

Appendix C – Documents Cited in Kreindler and Pounian Affidavit

Source	Exhibit	Paragraph	Previous Use	Cited in Other Affidavits, Declarations, or Filings	Reasons Inadmissible and/or Immaterial
US v. Arnaout Plea Agreement	Exhibit 218	174			Hearsay, FRE 602, FRE 901
Canada Revenue Agency - WAMY Revocation	Exhibit 219	174			
WAMY INTL Production re Rageah	Exhibit 220	175			
FBI Timeline excerpt	Exhibit 221	175		Tarbutton Ex. 68	Hearsay, FRE 602, FRE 901, Preliminary investigative material
03-MDL-1570 Affidavit of Abdullah Awad Binladin	Exhibit 222	176, 187	ECF No. 1505-2		Hearsay
Transcom Int'l and Deutsche Telekom Bill for Bahaji	Exhibit 223	177			FRE 901
WAMY agreement with Transcom for printing	Exhibit 224	178			FRE 901
Aulaqi employment contract	Exhibit 225	179			FRE 901
02-cv-01616 DCDC - Declaration Mutaz Saleh Abu Unuq	Exhibit 226	180	Aver. Ex. 178 (ECF No. 2930)		Hearsay, FRE 602
OFAC Middle East Trip Summary of visit to KSA re terror financing	Exhibit 227	182			Hearsay, FRE 602, FRE 901
Impact International - Obituary of Dr Maneh al Johani	Exhibit 228	184			Hearsay, FRE 602, FRE 901
WAMY Trustees Dr. al Ayed	Exhibit 229	186			Hearsay
The Bin Ladens by Steve Coll excerpts	Exhibit 230	188			Hearsay, FRE 602
WAMY INTL 7713 Bin Faris payroll	Exhibit 231	189			FRE 901
Letter to Sec-Gen re WAMY request for KSA to buy DC building for WAMY, 7-22-92	Exhibit 232	190			

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KSA's IIASA letter to WAMY re funding GW student daughter of IIASA teacher, 6-15-01	Exhibit 233	191			
WAMY payment voucher for IIASA phone bill, 1-6-94	Exhibit 234	192			Hearsay, FRE 901
IIASA staff fairwell party WAMY sponsorship, 6-17-01	Exhibit 235	192			Hearsay, FRE 901
KSA Embassy, New Delhi to WAMY re financing building 31 mosques in India, 2-29-00	Exhibit 236	193			
03-MDL-1570 Saudi High Commission - Motion to Dismiss - June 25, 2004 Excerpts	Exhibit 237	195	ECF No. 262-1		Hearsay, FRE 602
Defense Intelligence Agency FOIA Response excerpts	Exhibit 238	196, 217			Hearsay, FRE 602, FRE 901
German Federal Office of Criminal Investigation report on TWRA excerpt	Exhibit 239	197	Affirm. of Sean P. Carter, Ex. 19 (ECF No. 2927-19); Aver. Ex. 231 (ECF No. 2930)		Hearsay, FRE 602, FRE 901, Preliminary investigative material
FBI Interviews of Jamal al Fadl excerpts	Exhibit 240	198	Aver. Exs. 139, 142 (ECF No. 2930)		Hearsay, FRE 602, FRE 901, Preliminary investigative material
03-MDL-1570 Declaration of Ali Ahmad Ali Hamad, March 4, 2008	Exhibit 241	199	Affirm. of Sean P. Carter, Ex. 18 (ECF No. 2927-18); Aver. Ex. 224 (ECF No. 2930)		Hearsay

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Department of Defense JTTF-GTMO Detainee Assessment SA 005	Exhibit 242	200			Hearsay, FRE 602, FRE 901, Preliminary investigative material
State Department Cable September 9, 2002 Bosnias Dirty Dozen	Exhibit 243	201	Aver. Ex. 229 (ECF No. 2930)	Tarbutton Ex. 16	Hearsay, FRE 602, Preliminary investigative material
Statement of Yasin Kadi to OFAC Excerpts and Treasury Designations	Exhibit 244	203-204			Hearsay
Al Sharq al Awsat account of Prince Salman's trip to Bosnia	Exhibit 245	205			Hearsay, FRE 602, FRE 901
Kadi Discovery SHC - KA Stan	Exhibit 246	204			Hearsay, FRE 901
03-MDL-1570 SHC Declarations	Exhibit 247	207-208	ECF No. 262-3; Aver. Exs. 222, 223 (ECF No. 2930)		
03-MDL-1570 Declaration Abdulrahman al-Suwailem SJRC	Exhibit 248	209	ECF No. 631-3; Aver. Ex. 247 (ECF No. 2930)		Hearsay
Declaration of Abdul Rahman Swailem of April 2, 2004	Exhibit 249	210	ECF No. 99-2; Aver. Ex. 241 (ECF No. 2930)		Hearsay, FRE 602
Saudi Embassy News Archives - King Fahd orders relief aid for Afghanis - March 17, 2001	Exhibit 250	211			Hearsay, FRE 602
Saudi Embassy News Archives Jan, April, May, July 2001	Exhibit 251	212			Hearsay, FRE 602
Without Precedent by Thomas H Kean and Lee H Hamilton excerpt	Exhibit 252	213, 216			Hearsay, FRE 602

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The Commission by Philip Shenon excerpt	Exhibit 253	214	Aver. Ex. 44 (ECF No. 2930)		Hearsay, FRE 602
Declaration of Richard Ben Veniste October 12, 2017	Exhibit 254	215		Tarbutton Ex. 3	Hearsay, FRE 602
ODNI Abbottabad Documents excerpts	Exhibit 255	217			Hearsay
03-MDL-1570 Affidavit of Bakr Binladin January 27, 2006 Excerpt	Exhibit 256	217	ECF No. 1645-4		Hearsay
State Department Cable Islamabad November 10, 1998	Exhibit 257	217			Hearsay, FRE 602, FRE 901
Saudi Embassy News Archives - Prince Nayef Gives Press Conference - October 20, 2001	Exhibit 258	217			Hearsay, FRE 602, Preliminary investigative material
Ghost Wars by Steve Coll excerpt	Exhibit 259	217			Hearsay, FRE 602
911 Commission Staff Statement No. 5 Diplomacy	Exhibit 260	217			Hearsay, Preliminary investigative material
Frontline Interview Prince Bandar Bin Sultan - Late September, 2001	Exhibit 261	217			
Taliban by Ahmed Rashid Excerpt	Exhibit 262	217			Hearsay
CIA report on Ariana Airlines of July 29, 1999 excerpts	Exhibit 263	218			Hearsay, FRE 901, Preliminary investigative material
Ariana Airlines Schedule Advisory	Exhibit 264	218			Hearsay, FRE 901

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9/11 Report	N/A	7, 9, 14-17, 33, 41-42, 55, 94, 177, 179, 196, 216-218	Averment	Rapawy Exs. 1-3	Generally admissible. As cited in paragraphs 7, 14, 15, 16, 33, 196, and 216, inadmissible as hearsay.
Defendant MWL's Answer to Third Amended Complaint, <i>Ashton v. Al Qaeda Islamic Army</i> , MDL 1570, Doc. 346 (filed July 30, 2004)	N/A	97			Hearsay, FRE 602
Defendant IIRO's Amended Answer to Plaintiffs First Amended Complaint, <i>Federal Ins. Co. v. Al Qaeda</i> , MDL 1570, Doc. 1548 (filed Dec. 13, 2005)	N/A	97	Aver. Ex. 133 (ECF No. 2930)		Hearsay, FRE 602